

LOW-INCOME CONSUMERS

71. **SHOULD THE NEW UNIVERSAL SERVICE FUND PROVIDE SUPPORT FOR THE LIFELINE AND LINKUP PROGRAMS, IN ORDER TO MAKE THOSE SUBSIDIES TECHNOLOGICALLY AND COMPETITIVELY NEUTRAL? IF SO, SHOULD THE AMOUNT OF THE LIFELINE SUBSIDY STILL BE TIED, AS IT IS NOW, TO THE AMOUNT OF THE SUBSCRIBER LINE CHARGE?**

The answer to the first question is "yes." Regarding the second question, the amount of the subsidy need not be tied to the amount of the SLC. A fresh evaluation of the financial/affordability needs of low income individuals must occur to determine the appropriate amount of support for them. Furthermore, the combination of support from federal and state jurisdictions must also be taken into account. Finally, a new evaluation may show that the requisite remedy for some individuals is not money but some other capability of the telecommunications system, such as toll blocking.

ADMINISTRATION OF UNIVERSAL SERVICE SUPPORT

72. SECTION 254(D) OF THE 1996 ACT PROVIDES THAT THE COMMISSION MAY EXEMPT CARRIERS FROM CONTRIBUTING TO THE SUPPORT OF UNIVERSAL SERVICE IF THEIR CONTRIBUTION WOULD BE "DE MINIMIS." THE CONFERENCE REPORT INDICATES THAT "[T]HE CONFEREES INTEND THAT THIS AUTHORITY WOULD ONLY BE USED IN CASES WHERE THE ADMINISTRATIVE COST OF COLLECTING CONTRIBUTIONS FROM A CARRIER OR CARRIERS WOULD EXCEED THE CONTRIBUTION THAT CARRIER WOULD OTHERWISE HAVE TO MAKE UNDER THE FORMULA FOR CONTRIBUTIONS SELECTED BY THE COMMISSION." WHAT LEVELS OF ADMINISTRATIVE COSTS SHOULD BE EXPECTED PER CARRIER UNDER THE VARIOUS METHODS THAT HAVE BEEN PROPOSED FOR FUNDING (E.G., GROSS REVENUES, REVENUES NET OF PAYMENTS TO OTHER CARRIERS, RETAIL REVENUES, ETC.)?

The amount of administrative costs, to a fund administrator or even to the carriers themselves, cannot be determined a priori. The costs to a fund administrator should be determined through a bidding process among neutral third parties. Only after that process is completed and the costs are known can the de minimis standard be evaluated. In any event, the administrative costs of a funding method must be balanced with its elements of competitive neutrality. For example, a retail revenues or net revenues methodology may have somewhat higher administrative costs than a gross revenues methodology, but their competitive neutrality properties are far superior.

II

CONCLUSION

Ameritech appreciates the opportunity to offers its answers to the 72 questions posed in the Public Notice, and trusts they will assist the Joint Board and the Commission as they craft new rules for universal service under the Telecommunications Act of 1996.

Respectfully submitted,

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August 2, 1996

**Example of Funding for Schools Assuming Nynex Education Plan*
Connection to Schools Only**

Millions of Dollars

Company	Net Total Revenue:		Funding Contribution by Year					
	Amount	% of Total	1	2	3	4	5	6 +
AT&T	\$21,441	13.3%	\$60.1	\$77.3	\$82.4	\$84.1	\$94.5	\$68.7
MCI	\$6,758	4.2%	\$18.9	\$24.4	\$26.0	\$26.5	\$29.8	\$21.7
Sprint/United	\$7,129	4.4%	\$20.0	\$25.7	\$27.4	\$28.0	\$31.4	\$22.8
Ameritech	\$9,349	5.8%	\$26.2	\$33.7	\$35.9	\$36.7	\$41.2	\$30.0
Bell Atlantic	\$9,987	6.2%	\$28.0	\$36.0	\$38.4	\$39.2	\$44.0	\$32.0
Bell South	\$12,252	7.6%	\$34.3	\$44.1	\$47.1	\$48.1	\$54.0	\$39.3
US West	\$7,995	5.0%	\$22.4	\$28.8	\$30.7	\$31.4	\$35.2	\$25.6
Nynex	\$11,145	6.9%	\$31.2	\$40.2	\$42.8	\$43.7	\$49.1	\$35.7
Pacific	\$7,716	4.8%	\$21.6	\$27.8	\$29.7	\$30.3	\$34.0	\$24.7
SBC	\$6,468	4.0%	\$18.1	\$23.3	\$24.9	\$25.4	\$28.5	\$20.7
GTE	\$10,449	6.5%	\$29.3	\$37.7	\$40.2	\$41.0	\$46.0	\$33.5
Cincinnati	\$507	0.3%	\$1.4	\$1.8	\$2.0	\$2.0	\$2.2	\$1.6
SNET	\$1,250	0.8%	\$3.5	\$4.5	\$4.8	\$4.9	\$5.5	\$4.0
Rochester	\$244	0.2%	\$0.7	\$0.9	\$0.9	\$1.0	\$1.1	\$0.8
Lincoln	\$143	0.1%	\$0.4	\$0.5	\$0.6	\$0.6	\$0.6	\$0.5
Puerto Rico	\$862	0.5%	\$2.4	\$3.1	\$3.3	\$3.4	\$3.8	\$2.8
Others	\$6,738	4.2%	\$18.9	\$24.3	\$25.9	\$26.4	\$29.7	\$21.6
Cable Industry	\$22,786	14.2%	\$63.9	\$82.1	\$87.6	\$89.4	\$100.4	\$73.0
Wireless Industry	\$17,481	10.9%	\$49.0	\$63.0	\$67.2	\$68.6	\$77.0	\$56.0

Total	\$160,698	100%	\$450.3	\$579.1	\$617.8	\$630.7	\$707.9	\$515.0
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Nationwide Access Lines (Millions)	157.173	165.031	173.283	181.947	191.045	200.597
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\$/Access Line/Month	\$0.24	\$0.29	\$0.30	\$0.29	\$0.31	\$0.21
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Notes: * Nynex Education Plan assumes deployment of the "partial classroom model" contained in the Kickstart Initiative paper. This model would connect half the Public school classrooms in America over the next 5 years. The costs of Connection to the School were identified by McKinsey and Company to be \$1.715 billion in initial costs and \$1.030 billion in ongoing costs. The Nynex Education Plan assumes that the Benchmark Discount costs would be set at 75% for initial costs and at 50% for ongoing costs. Further the Plan assumes a deployment of 25% for Year 1, 25% for Year 2, 20% for Year 3, 15% for Year 4, and 15% for Year 5. Additional amounts would be necessary to include Private Schools.

Funding Based on Total Revenues Net of Payments to Others

Cable Industry Revenue: from Table 6, CS Docket 95-61, Second Annual Report, FCC data for 1994

Wireless Industry Revenue: CTIA Revenue for 6 months ended June, 1995; annualized

IXC Revenue Source: Statistics of Communications Common Carriers, December, 1995, Table 1.4
Access Payments estimated based on % Share of Toll Revenue

LEC Revenue Source: Statistics of Communications Common Carriers, December, 1995, Table 2.9

Access Lines assumed to grow at 5% per year

Attachment A-2

Example of Funding for Schools Assuming Nynex Education Plan* Connection to Schools Only

Millions of Dollars

Company	Net Interstate Revenue:		Funding Contribution by Year					
	Amount	% of Total	1	2	3	4	5	6 +
AT&T	\$16,090	31.8%	\$143.4	\$184.3	\$196.7	\$200.8	\$225.4	\$163.9
MCI	\$5,072	10.0%	\$45.2	\$58.1	\$62.0	\$63.3	\$71.0	\$51.7
Sprint/United	\$3,807	7.5%	\$33.9	\$43.6	\$46.5	\$47.5	\$53.3	\$38.8
Ameritech	\$2,210	4.4%	\$19.7	\$25.3	\$27.0	\$27.6	\$31.0	\$22.5
Bell Atlantic	\$2,713	5.4%	\$24.2	\$31.1	\$33.2	\$33.9	\$38.0	\$27.6
Bell South	\$3,245	6.4%	\$28.9	\$37.2	\$39.7	\$40.5	\$45.4	\$33.1
US West	\$2,245	4.4%	\$20.0	\$25.7	\$27.4	\$28.0	\$31.5	\$22.9
Nynex	\$3,102	6.1%	\$27.6	\$35.5	\$37.9	\$38.7	\$43.4	\$31.6
Pacific	\$1,682	3.3%	\$15.0	\$19.3	\$20.6	\$21.0	\$23.6	\$17.1
SBC	\$1,912	3.8%	\$17.0	\$21.9	\$23.4	\$23.9	\$26.8	\$19.5
GTE	\$2,592	5.1%	\$23.1	\$29.7	\$31.7	\$32.3	\$36.3	\$26.4
Cincinnati	\$107	0.2%	\$1.0	\$1.2	\$1.3	\$1.3	\$1.5	\$1.1
SNET	\$343	0.7%	\$3.1	\$3.9	\$4.2	\$4.3	\$4.8	\$3.5
Rochester	\$58	0.1%	\$0.5	\$0.7	\$0.7	\$0.7	\$0.8	\$0.6
Lincoln	\$30	0.1%	\$0.3	\$0.3	\$0.4	\$0.4	\$0.4	\$0.3
Puerto Rico	\$194	0.4%	\$1.7	\$2.2	\$2.4	\$2.4	\$2.7	\$2.0
Others	\$5,139	10.2%	\$45.8	\$58.9	\$62.8	\$64.1	\$72.0	\$52.4
Cable Industry	NA	0.0%	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Wireless Industry	NA	0.0%	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Total	\$50,544	100%	\$450.3	\$579.1	\$617.8	\$630.7	\$707.9	\$515.0
Nationwide Access Lines (Millions)			157.173	165.031	173.283	181.947	191.045	200.597
\$/Access Line/Month			\$0.24	\$0.29	\$0.30	\$0.29	\$0.31	\$0.21

Notes: * Nynex Education Plan assumes deployment of the "partial classroom model" contained in the Kickstart Initiative paper. This model would connect half the Public school classrooms in America over the next 5 years. The costs of Connection to the School were identified by McKinsey and Company to be \$1.715 billion in initial costs and \$1.030 billion in ongoing costs. The Nynex Education Plan assumes that the Benchmark Discount costs would be set at 75% for initial costs and at 50% for ongoing costs. Further the Plan assumes a deployment of 25% for Year 1, 25% for Year 2, 20% for Year 3, 15% for Year 4, and 15% for Year 5. Additional amounts would be necessary to include Private Schools.

Funding Based on Interstate Revenues Net of Payments to Others

IXC Revenue Source: Statistics of Communications Common Carriers, December, 1995, Table 1.4
Access Payments estimated based on % Share of Toll Revenue
Interstate Revenue estimated based on % Interstate Access Revenue

LEC Revenue Source: Statistics of Communications Common Carriers, December, 1995, Table 2.9

Access Lines assumed to grow at 5% per year

Attachment B-1

Example of Funding for Schools Assuming Nynex Education Plan* Connection to Schools and Connection within Schools

Millions of Dollars

Company	Net Total Revenue:		Funding Contribution by Year					
	Amount	% of Total	1	2	3	4	5	6 +
AT&T	\$21,441	13.3%	\$192.6	\$216.6	\$202.1	\$182.8	\$197.2	\$96.1
MCI	\$6,758	4.2%	\$60.7	\$68.3	\$63.7	\$57.6	\$62.2	\$30.3
Sprint/United	\$7,129	4.4%	\$64.0	\$72.0	\$67.2	\$60.8	\$65.6	\$31.9
Ameritech	\$9,349	5.8%	\$84.0	\$94.5	\$88.1	\$79.7	\$86.0	\$41.9
Bell Atlantic	\$9,987	6.2%	\$89.7	\$100.9	\$94.2	\$85.2	\$91.9	\$44.7
Bell South	\$12,252	7.6%	\$110.1	\$123.8	\$115.5	\$104.5	\$112.7	\$54.9
US West	\$7,995	5.0%	\$71.8	\$80.8	\$75.4	\$68.2	\$73.5	\$35.8
Nynex	\$11,145	6.9%	\$100.1	\$112.6	\$105.1	\$95.0	\$102.5	\$49.9
Pacific	\$7,716	4.8%	\$69.3	\$78.0	\$72.7	\$65.8	\$71.0	\$34.6
SBC	\$6,468	4.0%	\$58.1	\$65.4	\$61.0	\$55.2	\$59.5	\$29.0
GTE	\$10,449	6.5%	\$93.9	\$105.6	\$98.5	\$89.1	\$96.1	\$46.8
Cincinnati	\$507	0.3%	\$4.6	\$5.1	\$4.8	\$4.3	\$4.7	\$2.3
SNET	\$1,250	0.8%	\$11.2	\$12.6	\$11.8	\$10.7	\$11.5	\$5.6
Rochester	\$244	0.2%	\$2.2	\$2.5	\$2.3	\$2.1	\$2.2	\$1.1
Lincoln	\$143	0.1%	\$1.3	\$1.4	\$1.4	\$1.2	\$1.3	\$0.6
Puerto Rico	\$862	0.5%	\$7.7	\$8.7	\$8.1	\$7.4	\$7.9	\$3.9
Others	\$6,738	4.2%	\$60.5	\$68.1	\$63.5	\$57.4	\$62.0	\$30.2
Cable Industry	\$22,786	14.2%	\$204.7	\$230.2	\$214.8	\$194.3	\$209.6	\$102.1
Wireless Industry	\$17,481	10.9%	\$157.1	\$176.6	\$164.8	\$149.1	\$160.8	\$78.3

Total	\$160,698	100%	\$1,443.8	\$1,623.8	\$1,515.0	\$1,370.3	\$1,478.3	\$720.0
Nationwide Access Lines (Millions)			157.173	165.031	173.283	181.947	191.045	200.597
\$/Access Line/Month			\$0.77	\$0.82	\$0.73	\$0.63	\$0.64	\$0.30

Notes: * Nynex Education Plan assumes deployment of the "partial classroom model" contained in the Kickstart Initiative paper. This model would connect half the Public school classrooms in America over the next 5 years. The costs of Connection to the School were identified by McKinsey and Company to be \$1.715 billion in initial costs and \$1.030 billion in ongoing cost. The costs of Connection within the School were estimated to be \$5.025 billion initial and \$0.410 billion ongoing. The Nynex Education Plan assumes that the Benchmark Discount cost would be set at 75% for initial costs and at 50% for ongoing costs. Further the Plan assumes deployment of 25% for Year 1, 25% for Year 2, 20% for Year 3, 15% for Year 4, and 15% for Year 5. Additional amounts would be necessary to include Private Schools.

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Access Lines assumed to grow at 5% per year

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MCI	\$5,072	10.0%	\$144.9	\$162.9	\$152.0	\$137.5	\$148.3	\$72.2
Sprint/United	\$3,807	7.5%	\$108.7	\$122.3	\$114.1	\$103.2	\$111.3	\$54.2
Ameritech	\$2,210	4.4%	\$63.1	\$71.0	\$66.3	\$59.9	\$64.6	\$31.5
Bell Atlantic	\$2,713	5.4%	\$77.5	\$87.2	\$81.3	\$73.6	\$79.4	\$38.6
Bell South	\$3,245	6.4%	\$92.7	\$104.2	\$97.3	\$88.0	\$94.9	\$46.2
US West	\$2,245	4.4%	\$64.1	\$72.1	\$67.3	\$60.9	\$65.7	\$32.0
Nynex	\$3,102	6.1%	\$88.6	\$99.6	\$93.0	\$84.1	\$90.7	\$44.2
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GTE	\$2,592	5.1%	\$74.1	\$83.3	\$77.7	\$70.3	\$75.8	\$36.9
Cincinnati	\$107	0.2%	\$3.1	\$3.4	\$3.2	\$2.9	\$3.1	\$1.5
SNET	\$343	0.7%	\$9.8	\$11.0	\$10.3	\$9.3	\$10.0	\$4.9
Rochester	\$58	0.1%	\$1.6	\$1.8	\$1.7	\$1.6	\$1.7	\$0.8
Lincoln	\$30	0.1%	\$0.9	\$1.0	\$0.9	\$0.8	\$0.9	\$0.4
Puerto Rico	\$194	0.4%	\$5.5	\$6.2	\$5.8	\$5.3	\$5.7	\$2.8
Others	\$5,139	10.2%	\$146.8	\$165.1	\$154.1	\$139.3	\$150.3	\$73.2
Cable Industry	NA	0.0%	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Wireless Industry	NA	0.0%	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0

Total	\$50,544	100%	\$1,443.8	\$1,623.8	\$1,515.0	\$1,370.3	\$1,478.3	\$720.0
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Nationwide Access Lines (Millions)	157.173	165.031	173.283	181.947	191.045	200.597
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\$/Access Line/Month	\$0.77	\$0.82	\$0.73	\$0.63	\$0.64	\$0.30
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Notes: * Nynex Education Plan assumes deployment of the "partial classroom model" contained in the Kickstart Initiative paper. This model would connect half the Public school classrooms in America over the next 5 years. The costs of Connection to the School were identified by McKinsey and Company to be \$1.715 billion in initial costs and \$1.030 billion in ongoing costs. The Nynex Education Plan assumes that the Benchmark Discount costs would be set at 75% for initial costs and at 50% for ongoing costs. Further the Plan assumes a deployment of 25% for Year 1, 25% for Year 2, 20% for Year 3, 15% for Year 4, and 15% for Year 5. Additional amounts would be necessary to include Private Schools.

Funding Based on Interstate Revenues Net of Payments to Others

IXC Revenue Source: Statistics of Communications Common Carriers, December, 1995, Table 1.4
Access Payments estimated based on % Share of Toll Revenue
Interstate Revenue estimated based on % Interstate Access Revenue

LEC Revenue Source: Statistics of Communications Common Carriers, December, 1995, Table 2.9

Access Lines assumed to grow at 5% per year

Attachment C

The costs identified by McKinsey and Company for the "partial classroom model" are as follows:

	\$ Millions	
	<u>Initial</u>	<u>Ongoing</u>
Connection to School	\$ 1,715	\$ 1,030
Connection within School	\$ 5,025	\$ 410
Hardware	\$13,740	\$ 1,130
Content	\$ 3,505	\$ 1,715
Professional Development	\$ 3,665	\$ 2,435
System Operation	\$ 1,220	\$ 810
TOTAL	\$28,870	\$ 7,530

The examples in attachments A-1, A-2, B-1, and B-2 are based on the McKinsey report and on the Nynex Education Plan (NEP). The NEP assumes a 5-year deployment of the partial classroom model with a 75% discount for initial costs and a 50% discount for ongoing costs. Further, it assumes a deployment schedule of 25% for year 1, 25% for year 2, 20% for year 3, 15% for year 4, and 15% for year 5. Thus, the NEP assumes costs of:

	\$ Millions					
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6+
Connection to School						
Initial	\$ 322	\$ 322	\$ 257	\$ 193	\$ 193	\$ 0
Ongoing	<u>\$ 129</u>	<u>\$ 258</u>	<u>\$ 361</u>	<u>\$ 438</u>	<u>\$ 515</u>	<u>\$ 515</u>
Total	\$ 450	\$ 579	\$ 618	\$ 631	\$ 708	\$ 515
Connection to School & Connection within School						
Initial	\$1,264	\$1,264	\$1,011	\$ 758	\$ 758	\$ 0
Ongoing	<u>\$ 180</u>	<u>\$ 360</u>	<u>\$ 504</u>	<u>\$ 612</u>	<u>\$ 720</u>	<u>\$ 720</u>
Total	\$1,444	\$1,624	\$1,515	\$1,370	\$1,478	\$ 720

Description of Educational Discount Plans for States in the Ameritech Region

Ohio

Ameritech Ohio has an established discount program where state chartered educational institutions (any grade K-12) receive a 10% discount off rates for intrastate regulated services provided by Ameritech Ohio.

The educational 10% discount program has resulted in savings to schools of \$1,116,217 in 1995 and of \$463,075 through April, 1996.

Measurable outcomes of this discount are not available.

Wisconsin

Wisconsin has one discount program for schools, libraries, and health care providers in its Universal Service Rules which went into effect 5/1/96. This program provides discounts according to the following schedule:

Maximum of 30% or 300/month for year 1
Maximum of 20% or 200/month for year 2
Maximum of 10% or 100/month for year 3.

These discounts are for Internet access connections, distance learning or high speed data connections for schools, colleges, libraries, and non-profit hospitals.

In addition, the following restrictions apply:

- Discounts are for new services only
- There is only one discount at a time per eligible customer.

The program is funded through a state tax on intrastate revenues placed on the services of all providers. The only exception is cellular, which is exempted by state law. The money is collected by the state and placed in a Universal Service fund. The money is dispersed directly to the institutions with the Wisconsin PUC acting as the administrative disbursing agency. The estimated contribution for Ameritech-Wisconsin for 1996 is \$2 million. Since the program has just begun, there are no measurable results yet available.

CERTIFICATE OF SERVICE

I, Todd H. Bond, do hereby certify that a copy of Ameritech's Further Comments, has been served on the parties listed on the attached service list, via first class mail, postage prepaid, on this 2nd day of August 1996.

By: Todd H. Bond
Todd H. Bond *THB*

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